



# Pesticide Label Inspection Checklist

## Producer Establishment Inspections

When a producer establishment inspection is being conducted, a word-for-word comparison with the registered label, when available, should be made of all products. The inspector should ascertain compliance with all stipulations of the letter(s) of acceptance.

The inspector may make label comparisons to “bin” labels at the discretion of his/her supervisor. Official samples may only be collected from products that are packaged, labeled, and released for shipment. However, a “bin” labeling review can provide a valuable background for follow-up sampling at consignees and obtaining voluntary corrective action at the producer level.

## Marketplace Inspections

When conducting labeling reviews, the inspector should be aware of labeling requirements and be alert for products that may be violative. The following paragraphs list some of the things an inspector should be aware of:

*Product Name, Brand, or Trademark*

- ✓ Name of Manufacturer, Registrant, or Person for Whom Manufactured. If the product is not produced by the registrant, the name must be qualified by “packed for...,” “distributed by...,” “sold by...,” or a similar statement.
- ✓ EPA Registration Number. The EPA Registration Number may be listed as “EPA Registration No. XXXX-XX,” “EPA Reg. No. XXXX-XX,” or “EPA Reg. No. XXX-XX-YYYY.” (The “YYYY” is the supplemental registrant’s company number.)
- ✓ EPA Establishment Number. The EPA Establishment Number may appear in any location on the label or immediate container; however, it must appear on the outside container or wrapper of the package if the EPA Establishment Number on the immediate container cannot be clearly read through the outside wrapper or container. It must be listed as “EPA Est. XXXX-(state abbreviation)-XX,” or “EPA EST NO. XXXX (state abbreviation)-XX.”
- ✓ Net Content Statement. The net contents must be given in units commonly used in the United States (i.e., pounds, ounces, pints, quarts, gallons). Metric Units may also be listed. Liquid units must be used if the product is liquid and weight units must be used if the product is solid, semisolid, or viscous. Contents must be expressed in terms of the largest unit present.
- ✓ Ingredient Statement. The ingredient statement usually appears on the front panel. The names used for each ingredient shall be the accepted common name, if there is one, followed by the chemical name. The common name may be used alone if it is well known.

NOTE: The ingredient statements for products containing arsenic must have a sub statement giving the percentage of total and water-soluble arsenic, each calculated as elemental arsenic.

- T**     Warning or Citation Statements. The signal words, “Danger,” “Warning,” or “Caution” and the statement “KEEP OUT OF THE REACH OF CHILDREN” must appear on the front panel of the label. Any substances in quantities highly toxic to humans must bear all of the following on the label: (1) a skull and crossbones, (2) the word “POISON” in red on a contrasting background, and (3) a statement of practical treatment. In addition, the label must contain precautionary statements necessary to prevent injury to humans and the environment.
- T**     Directions for Use. Directions for using the product must include the following: (1) the site of application, (2) the rate of application, (3) instructions for frequency and timing applications, (4) restrictions and warnings, (5) any other pertinent information necessary for the protection of the public, and (6) target pest.
- T**     Legibility of Labeling. Product labeling must be clearly legible and easy to read by a person with normal vision. All required label or labeling text shall appear in the English language. However, the Agency may require or the applicant may propose additional text in other languages as is considered necessary to protect the public. When additional text is necessary, all labeling requirements will be applied equally to both the English and other language versions of the labeling.
- T**     Disclaimer Statements. Labeling disclaimers that negate or distract from required labeling information are not acceptable. The following are examples of unacceptable and acceptable disclaimers:
- **Unacceptable.** “The information furnished hereon is provided gratuitously by the manufacturer, who assumes no responsibility whatsoever for the effectiveness or safety of this product, regardless of whether or not it is used as directed.”
  - **Acceptable.** “Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material, when such use and/or handling is contrary to label instructions.”
- ✓     Statement of Use Classification. All RUP products must have the RUP statement on the top of the center of the label.

If a review of “bin” labels, for which there is no product packaged, labeled, and released for shipment, reveals a discrepancy, it should be brought to the attention of the inspector’s

management. Names and addresses of the consignees of the misbranded product should be obtained to follow up the investigation and collect samples of the product.

### **Marketplace Inspections**

Samples should be collected of all products found with the violative labels or labeling. The inspector should exercise care in obtaining the proper shipping records that cover all of the products in stock.

If the inspector is unsure of any label or labeling or if a serious violation has been discovered, he/she should call his/her supervisor while still in the vicinity of the establishment. The supervisor may have access to information on the product that would help to decide whether to have the product sampled or even stop sale the product.

### **Accompanying Labeling**

Copies of accompanying labeling initiated and dated by a responsible company representative should be collected and documented.

When violative labeling is collected, it should be documented with a statement signed by a responsible individual of the firm, which clearly states that relationship of the labeling to the goods including the following:

- T**     Description of Labeling. Describe briefly each piece of literature by name and also the manner in which the literature was received. State the quantity of such labeling on hand.
- T**     Location of Labeling. Report the location of each piece of literature and how much each is on hand
- T**     Methods of Distribution. Determine how the labeling is distributed (i.e., accompanied product, shipped under separate cover).
- T**     Source of Labeling. Was the labeling sent to the dealer by the shipper of the product or was it prepared by the dealer himself? If received from the shipper of the product, document the shipment of the labeling. If prepared by the dealer, determine whether the producer provided the test.
- T**     Instructions to Dealer. The manufacturer or shipper sometimes provides sales promotion instructions to the dealer. Obtain copies of such instructions, if available, as well as any verbal instructions on how to use them